



South Coast Air Quality Management District

Engineering & Compliance

*Policies &
Procedures*

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

MEMORANDUM

DATE: April 4, 1990
TO: All Engineering Personnel
FROM: Bill Dennison /s/ WJD
SUBJECT: Interpretation of Rule 1170

Rule 1170 requires at least one underground fuel storage tank at a motor fueling facility to be compatible with methanol. Rule 1170 also defines Motor Vehicle Fueling Facility to be

"...any facility that contains one or more motor vehicle fuel storage tanks and can dispense or transfer fuel into motor vehicles or internal combustion engines."

Xerox has a motor vehicle fueling facility, and it also has a diesel fuel tank (A/N 218753) which is dedicated solely for its emergency electrical generators. This diesel fuel tank is separate from other tanks in the fueling area, but is located on the same property. When this tank was installed, it was not methanol compatible. Since Xerox has no other tanks that are methanol compatible, strict application of the Rule 1170 would indicate that Xerox is not in compliance.

Rule 1170 only addresses motor fueling facilities, and was not intended for fuel tanks which are dedicated to a single stationary engine. According to the Rules Division, the wording "internal combustion engines" as stated above referred to other vehicles that are not licensed for the road (tractors, cranes, etc...) and portable engines (compressors, pumps, etc...). Therefore, fuel tanks that are hard-piped to a stationary engine were not covered by Rule 1170, as in the case at Xerox. Since Rule 1170 does not apply, Xerox could install a non-methanol compatible tank for its emergency electrical generators.

WJD:TDV

cc: Larry Bowen